

**PHILADELPHIA INDEMNITY INSURANCE COMPANY'S JOINDER TO THE  
LIMITED OBJECTION OF ASPEN AMERICAN INSURANCE COMPANY, BERKLEY  
INSURANCE COMPANY, EVEREST REINSURANCE COMPANY AND SIRIUS  
AMERICA INSURANCE COMPANY TO DEBTORS' MOTION [ECF NO. 625]  
SEEKING ENTRY OF AN ORDER EXTENDING THE EXCLUSIVE PERIODS  
PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE**

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WHEREFORE, Philadelphia requests that: (i) the Exclusivity Motion be denied unless and until the issues highlighted in the Limited Objection are addressed and (ii) this Court grant such other and further relief to which Philadelphia may be entitled.

Respectfully submitted,

MANIER & HEROD, P.C.

/s/ Michael E. Collins

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Company*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system and served upon all parties receiving notice pursuant to the CM/ECF system on December 22, 2020.

/s/ Michael E. Collins

Michael E. Collins